



U.S. Department of Housing and Urban
Development

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: The Spire
(Episcopal Church of the Resurrection Affordable Rental Housing Development Project)

Responsible Entity: The City of Alexandria, VA

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Preparer: Lucinda Metcalf, Asset Manager

Certifying Officer Name and Title: Mark B. Jinks, City Manager

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable):

Direct Comments to:

Office of Housing
City of Alexandria, VA
421 King Street, Suite 215
Alexandria, VA 22314
703-746-4990

Project Location: 2280 N. Beauregard Street within the boundaries of the Beauregard Small Area Plan.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Spire project is proposed to demolish the existing Church of the Resurrection building, subdivide the parcel, and construct an affordable multi-family building and new church building. The new church building will be located on the southern portion of the site to continue its ministry, food pantry, and other community services. The construction of the affordable, multi-family building will include up to 113 affordable units to be funded with a City loan, which includes federal HOME funds. The units will feature a mix of one, two and three-bedroom apartments, including 12 fully accessible units. 12 units will be affordable at 40% of the Area Median income (AMI), 45 units at 50% AMI, and 56 units at 60% AMI. The affordable building will be subject to a ground lease with the Church, and the units will be committed as affordable housing for 65 years.

The multi-family building will include a laundry facility, a community room, landscaped open space, and 80 underground parking spaces consistent with City's parking standards for affordable multifamily development. The apartments will be constructed to meet third-party certified energy efficiency standards.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The proposed development will provide a critical source of affordable housing for current and future low-and-moderate income residents at a range of incomes whose tenancy and local employment is essential to the Area's future economic development and sustainability, as well as the City's strategic plan goal of maintaining neighborhoods that are diverse, inclusive and true mixed-income communities.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is one lot of record measuring 87,473 square feet and is in the northwestern portion of the City, at the southeast corner of the intersection of North Beauregard Street and Fillmore Avenue. The western side of the project site is bounded by North Beauregard Street, the north and east boundaries are established by Fillmore Avenue and the southern boundary of the subject site is established by the Goodwin House property. The site is currently occupied by the Episcopal Church of the Resurrection, with one building of approximately 12,600 square feet and two parking lots with 81 spaces. The site has one existing curb cut off the end of Fillmore Avenue, which leads to the primary parking lot and a second curb cut to the lot, accessed from a private drive on the Goodwin House property leads to a second, smaller parking lot.

The land uses surrounding the subject site are primarily garden apartments, including Newport Village Apartments and Hermitage Hill, and institutional uses, such as the Northern Virginia Community College, The Hermitage, and Goodwin House. The variety of uses in the surrounding vicinity creates a mix of building heights, ranging from 45 feet for the garden-style residential, up to 180 feet for the taller institutional uses.

This portion of the City has a rich topographical character with significant grade changes which can further emphasize the relative heights of adjacent buildings. The subject site is irregularly shaped and includes a steep grade change along North Beauregard Street, with a majority of the subject site siting approximately 20 -30 feet above street level and a hillside buffered by vegetative growth along North Beauregard Street.

Overall, the site is well served by vehicular access as North Beauregard Street is a primary transportation corridor within the City. The site is served by multiple bus lines, including the 7 series (7A, 7F and 7Y), 22F, 28G, AT6, AT9 with service to the Pentagon, Old Town Alexandria, and Crystal City. The planned West End Transitway will further enhance the relative connectivity of the site to the rest of the City. The Beauregard Small Area Plan calls for additional transportation improvements to the subject site, including enhanced off-street bike and pedestrian trails along North Beauregard Street.

Funding Information

Grant Number	HUD Program	Funding Amount
M-17-MC54-0501	HOME and Match	\$900,000
F18-SG-51-0100	National Housing Trust Fund	\$500,000

Estimated Total HUD Funded Amount: \$1.4 million

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

The estimated total project cost is \$48M, which includes the following:

\$22,753,924 LIHTC
 \$11,543,000 Private Loan
 \$9,981,000 City Loan, including HOME
 \$1,832,577 Deferred Developer Fee
 \$620,000 Virginian Housing Trust Fund
 \$500,000 National Housing Trust Fund
 \$500,000 Federal Home Loan Bank Funds
 \$500,000 Sponsor Loan Funding

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 1: The impact category is not applicable to the proposed project as no airport runways clear zones fall within 15,000 feet of a military airport or 2,500 feet of a civilian airport. This Project is measured at 21,000 feet.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 2: The impact category is not applicable to the proposed project as there are no coastal barriers in the City of Alexandria.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 3: The redevelopment project site is not located in a flood zone area. The project is located in Zone X Area of Minimal Flood Hazard.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 4: According to an October 9, 2018 memorandum from the City's Environmental Program Manager from the Transportation and Environmental Services, Alexandria is meeting the National Ambient Air Quality Standards for pollutants and six particles. Therefore, this project is exempt from the conformity requirements.

Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 5: In compliance with the Commonwealth of Virginia's Department of Environmental Quality (letter dated September 27, 2018), the Project is consistent with the Virginia Coastal Zone Management Program if the developer obtains and complies with applicable permits and approvals related to the enforceable policies—as identified in the letter. Therefore, as each site and specific activity is identified and if any of the enforceable programs are applicable, the required permits and approvals will be obtained.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 6: In accordance with the attached Phase I Environmental Assessment conducted by ECS Mid-Atlantic, LLC, the Assessment revealed no evidence of recognized environmental conditions in connection with the property; however, ECS recommends that an asbestos and lead-based paint survey be performed prior to disturbing potential ACM/LBP due to the construction of the building on the site during 1966.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 7: In accordance to the October 5, 2018 letter from the Fish and Wildlife Service, there are no critical habitats within the project area under this Office's jurisdiction.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input type="checkbox"/>	See Tab 8: One active above-ground tank was identified within 1 mile of the proposed redevelopment site.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 9: The Project does not convert agriculture land to non-agriculture land as the subject Property is located in urban area that has been developed for nearly 150 years.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 10: The subject site is situated outside of the 100 year and 500year flood plain.
Historic Preservation	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The Department of Historic Resources (DHR) found that the proposed demolition

National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800		of the church constitutes an adverse effect, as per the Criteria for Adverse Effect. This adverse effect has been mitigated through the signing of a Memorandum of Agreement (MOA). See Tab 11, Exhibit A
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 12: The Noise Abatement and Control worksheet includes the Day/Night Noise Levels for calculation for roadway. The calculation does not include airport or railroad noise as they are not within the threshold. The calculation for road way is 66.85, which is acceptable according to the noise assessment guidelines.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 13: The review is in compliance. There are no sole source aquifers located near the site.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 14: No onsite or off-site wetlands are impacted by the propose development.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See Tab 15: Virginia has approximately 49,350 miles of river, but no designated wild and scenic rivers. Source: www.rives.gov/virginia.php .
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Project complies with the Zoning Ordinance, the Beauregard Small Area Plan, the Beauregard Urban Design Standards and Guidelines, and all applicable codes and adopted policies. The site and surrounding or surrounding neighborhood does not suffer from adverse environmental conditions and the proposed action will not create an adverse and disproportionate environmental impact or aggravate an existing impact.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The Redevelopment Project is in conformance with the Beauregard Small Area Plan, as this will be beneficial to the neighborhood. See Tab 17 for the City Council approval on various amendments to the redevelopment site, dated January 20, 2018. The City Council approved the Planning Commission recommendation with the amendments listed under Tab 17, including a Master Plan Amendment, Text Amendment, Rezoning, CDD Concept Plan Amendment, Development Special Use Permit, with site plan and subdivision, TMP Special Use Permit (Multi-family building, and Special use Permit (Church).
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	See Tab 18 for Geotechnical Report – The data developed during the study indicated that the subsoil and groundwater conditions are generally adaptable for the proposed development of the site, provided the recommendations presented in the Report are followed. The developer is required to comply with the City of Alexandria, Erosion and Sediment Control Code, Section 5, Chapter 4. All the required permits from Virginia Department of Environmental Quality, Environmental Protection Agency, Army Corps of Engineers, and/or Virginia Marine Resources shall be in place for all project construction and mitigation work prior to the Final Site Plan.
Hazards and Nuisances	2	See Tab 12. According to the City T&ES, during the construction phase, the construction team will have to comply with the development conditions and the City's regulations

including Site Safety and Noise		governing site safety and applicable noise ordinances. The Developer will have to prepare a noise study with eh Phase 1 final site plan for the multifamily building identifying the levels of noise residents of the project will be exposed to at the present time, and 10 years into the future in a manner consistent with the Noise Guidance Book used by the Department of Housing and Urban Development (HUD). A HUD Day/Night Noise Level (DNL) Assessment was conducted by staff and it was determined that the DNL noise exposure is at an acceptable level.
Energy Consumption	1	The City's Green Building Policy, adopted by City Council in 2009, applies to new construction. The policy requires residential projects, including affordable housing developments, to achieve a minimum Certification in Leadership in Energy and Environmental Design (LEED), or an equivalent standard.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	The development of the new construction may create jobs for residents. If openings are available, positions will be advertised and residents in the area, including residents within the area, including low-income, minority group members, and unemployed who meet the job skill qualifications will have the opportunity to apply.
Demographic Character Changes, Displacement	1	There is no displacement for the redevelopment project. The redevelopment project will provide the creation of 113 permanently affordable residential units which will help preserve affordable housing opportunities in the City and all the City to achieve almost 15% of the affordable housing units called for in the Beauregard Small Area Plan.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	1	See Tab 20. The applicant proposes to construct a mid-rise affordable housing building with 113 units. The student generation rate for affordable apartments is 0.45 students per unit, which if applied to the 113 affordable housing units, would be 51 students. This project is in the John Adams elementary school attendance area. The City has coordinated with the Alexandria City Public Schools and will integrate the proposed development project in forthcoming school enrollment forecasts. After construction of the multi-family building, ACPS will designate school bus routes and pick-up/drop-off locations to establish a safe location for students residing at the multi-

		<p>family building which is consistent with established school district procedures.</p> <p>The City's Public Art Policy, adopted by City Council in 2012, applies to new development projects within the City to encourage the growth of public art in the community. However, the Public Art Policy does include an exemption for both places of worship and for non-profit affordable housing. As the applicant's proposal is for the construction for an affordable multi-family building to be developed by AHC, Inc., the building is exempt from participating in the City's Public Art Policy. However, staff is available to work with the nonprofits to achieve a public art goal.</p>
Commercial Facilities	1	See Tab 19. The redevelopment site can achieve many of the goals of the Beauregard Small Area Plan as the site is and neighborhood are well-situated for growth. Ongoing redevelopment in Beauregard will bring additional housing, open space, and retail within one-half mile along N. Beauregard Street. Currently, there are many restaurants and cafes, grocery stores, clothing stores, and public transportation areas that are readily accessible to serve residents at the redevelopment location.
Health Care and Social Services	1	See Tab 22. There are several hospitals and medical centers that will be accessible for residents at the redevelopment location. These facilities provide drug addition, alcoholism and disorders treatments. Inova Alexandria Hospital, for example, is one of the many health care facilities that provides Comprehensive Addiction Treatment Services (CATS). The CATS program offers a continuum of care and can refer residents to appropriate programs if needed.
Solid Waste Disposal / Recycling	2	See Table 23. The developer shall provide storage space for both trash and recycling materials containers as outlined in the City's "Solid Waste and Recyclable Materials Storage Space Guidelines", or to the satisfaction of the Director of Transportation & Environmental Services. The developer shall submit a Recycling Implementation Plan form to the Solid Waste Division, as outline din Article H of Title 5, which requires all commercial properties to recycle.
Waste Water / Sanitary Sewers	2	See Tab 24. No impact is anticipated for solid waste, disposal and recycling. The sewer connection fee will be paid prior to release of the site plan for each phase and the developer will submit two originals of the Oil and Grease separator Maintenance Agreement with the City prior to the release of each final site plan
Water Supply	2	See Tab 25. No impact is anticipated on water supply. The developer will provide a site irrigation and/or water

		management plan developed installed and maintained to the satisfaction of the Directors of P&Z and Code Administration.
Public Safety - Police, Fire and Emergency Medical	1	See Tab 26. In coordination with the City's Emergency Services division, it was determined that access to the multifamily building would be provided from the N. Beauregard Street frontage. The developer will submit a lighting plan with the Phase 1 Final Site Plan to verify that lighting for both sites meets City standards. Other Emergency Features can be found in the City's Staff Report.
Parks, Open Space and Recreation	1	See Tab 27. Open space is provided at ground-level, although some is located above structure in the multi-family residents. The open space is intended to provide a blend of passive and active recreational spaces, with semi-private spaces for small or larger public gatherings. The open space includes a landscaped terrace along the North Beauregard frontage which integrates native plants and trees in a series of terrace along the North Beauregard frontage.
Transportation and Accessibility	1	<p>See Tab 28. Gorove/Slade Associates performed the Traffic Impact Study for the Church of the Resurrection's site to assess the potential impact of additional development on the surrounding roadway capacity. The developer is willing to construct a second private access road. This will generally improve the overall intersection operations.</p> <p>The residential parking complies with the City's established parking requirements for affordable multi-family development.</p> <p>Section 11-700 of the City's Zoning Ordinance requires development projects with more than 20 units to participate in a Transportation management Plan to encourage residents to maximize transit use through buses, ridesharing and bicycles and reduce the number of single vehicle occupancy trips. As the developer is proposing a development with 113 units, the developer is categorized as a tier 2 use within the classification of the Zoning ordinance and has developed a Transportation management Plan and is required to participate in the plan through Condition 45 of their approval.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	There are no unique natural features or water resources.
Vegetation, Wildlife	2	There are no critical habitats or endangered species within the project area. The developer will implement and follow a tree conservation and protection program that is developed per the City of Alexandria Landscape Guidelines and to the satisfaction of the Directors of Planning and Zoning and RP&CA. Prior to the release of the building plan for Phase 1, the developer shall identify a method to maximize the preservation of trees as indicated in the Staff Report during construction to the satisfaction of the Planning and Zoning and RPCA directors. See Tab 7.
Other Factors	2	No other factors were observed.

Additional Studies Performed: None

Field Inspection (Date and completed by):

At the time of completing this environmental assessment the field inspection was not yet initiated. Once the development plan for this project is approved, the developer will coordinate with the Transportation and Environmental Services Construction and Inspection staff to complete a pre-construction walk/survey of the sites. The existing conditions will be documented prior to any land disturbing activities for each phase.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

The Virginia Department of Historic Resources: Laura Lavernia, Architectural Historian
City of Alexandria Planning Department, Al Cox
U.S. Department of Housing and Urban Development
City of Alexandria, Department of Transportation & Environmental Services, Brian Rahal, Civil Engineer and Emilio K. Pundavela, Civil Engineer
The Virginia Department of Environmental Quality
AHC, Inc.
The United States Department of the Interior

List of Permits Obtained:

All required permits from Virginia Department of Environmental Quality, Environmental Protection Agency, Army Corps of Engineers, and/or Virginia Marine Resources shall be in place for all project construction and mitigation work prior to release of the Final Site Plan. This

includes the state requirement for a state General VPDES Permit for Discharges of Stormwater from Construction Activities (general permit) and associated Stormwater Pollution Prevention Plan (SWPPP) for land disturbing activities equal to or greater than one acre.

Public Outreach [24 CFR 50.23 & 58.43]:

There was a wide-range of extensive community outreach to groups, organizations, and citizens throughout the design phases of the proposal including the following:

- Affordable Housing Advisory Committee (Initial Presentation) - June 17, 2016
- Affordable Housing Advisory Committee - January 5, 2017
- Beauregard Design Advisory Committee - June 19, 2017
- Presentation at Goodwin House - July 19, 2017
- Beauregard Design Advisory Committee - September 25, 2017
- Beauregard Design Advisory Committee - October 23, 2017
- Presentation at the Hermitage - November 22, 2017
- Open House at the Church of the Resurrection - December 4, 2017
- Affordable Housing Advisory Committee - December 7, 2017
- Planning Commission Public Hearing December __, 2017
- City Council Public Hearing December __, 2017

Cumulative Impact Analysis [24 CFR 58.32]:

Construction of this project is estimated to be completed by the end of 2021

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Currently, there has not been any unresolved conflicts concerning alternative uses of available resources.

No Action Alternative [24 CFR 58.40(e)]:

Currently, there has not been any unresolved conflicts concerning alternative uses of available resources.

Summary of Findings and Conclusions:

The Department of Historic Resources (DHR) received information regarding the Episcopal Church of the Resurrection Redevelopment Project for review and comment. The project consists of the demolition of the existing Church of the Resurrection and the construction of the eight (8) story, mixed-used affordable housing project in addition to a new church. After receiving the project application and after receiving requested additional information, DHR recommended the City conduct a Phase II (evaluation) architectural survey of the church. The survey was submitted to DHR and met DHR's Survey Guidelines. The survey was presented to DHR's National Register Evaluation Committee for their assessment of the church's eligibility for listing in the National Register of Historic Places. After careful consideration and weighing the property's integrity, design, and historic context against Criteria Consideration A for religious properties, DHR is of the opinion that the church is potentially eligible for individual listing on the National Register of Historic Places under Criterion C for architectural merit and should be treated as an historic property for purposes of compliance with Section 106. DHR finds that the proposed demolition of the church constitutes an adverse effect, per the Criteria for Adverse Effect.

This adverse effect has been resolved through the signing of a Memorandum of Agreement. A Memorandum was completed May 27, 2019 with mitigation measures.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
The Church of the Resurrection is potentially eligible for individual listing on the National Register of Historic Places. The demolition of the church constitutes an adverse effect, as per the Criteria for Adverse Effect	This adverse effect has been mitigated through the signing of a Memorandum of Agreement (MOA). See Tab 11, Exhibit A

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature:  for LM Date: 5-30-19


Name/Title/Organization:

Lucinda Metcalf Asset Manager, City of Alexandria, Office of Housing

Certifying Officer Signature:  Date: 6-5-19

Name/Title: Mark B. Jinks, City Manager

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).


Deputy City Attorney
Approved as to Form